

THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	
	§	
ROBERT FARRELL BRINKLEY	§	CASE NO. 18-40812-R
XXX-XX-3831	§	
4302 CHEYENNE DRIVE	§	CHAPTER 13
ROWLETT, TX 75088	§	
	§	
DEBTOR	§	

TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN AFTER
CONFIRMATION

TO THE HONORABLE JUDGE OF THE UNITED STATES BANKRUPTCY COURT :

COMES NOW CAREY D. EBERT, the Standing Chapter 13 Trustee, and files this Objection to Debtor's Motion to Modify Chapter 13 Plan After Confirmation in the above styled case, and for cause would show the Court the following:

The Trustee objects to the Debtor's Motion to Modify Chapter 13 Plan After Confirmation on the following grounds:

The Debtor is delinquent \$4,322.34 on payments to the Trustee under the proposed plan.

The Debtor has not made a payment since January 7, 2020.

Debtor has not filed a current declaration regarding status of post-petition payments. (TXEB Local Form 3015-C)

WHEREFORE, PREMISES CONSIDERED, Carey D. Ebert, The Standing Chapter 13 Trustee, prays that the Court set a hearing on the matter and enter an order denying the Debtor's Motion to Modify Chapter 13 Plan After Confirmation and providing such other relief as is just and equitable.

Respectfully submitted,

/s/ H. Jefferson LeForce
Carey D. Ebert, Chapter 13 Trustee, TBN 05332500
H. Jefferson LeForce, TBN 00791094
Office of the Standing Chapter 13 Trustee
500 North Central Expressway, Suite 350
Plano, Texas 75074
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Objection to Debtor's Motion to Modify Chapter 13 Plan After Confirmation has been served upon the following parties in interest on the date set forth below by mailing a copy of same to them via first class mail.

ROBERT FARRELL BRINKLEY
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Dated: March 20, 2020

/s/ H. Jefferson LeForce

Office of the Standing Chapter 13 Trustee